

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph King Anderson, III, Administrative Law Judge

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JUN 05 2025

Appellate Case No. 2025-000294

SC Court of Appeals

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

South Carolina Department of Environmental Services,
Jim Young, and d/b/a J. Young Broilers., Respondents.

AND

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

South Carolina Department of Environmental Services
and Heath Coggins Broilers., Respondents.

DESIGNATION OF MATTER FOR RESPONDENTS JIM YOUNG, D/B/A J.
YOUNG BROILERS, AND HEATH COGGINS BROILERS

Respondents Jim Young and d.b.a J. Young Broilers, and Heath Coggins Broilers
(collectively, "Permittees") propose the following to be included in the Record on Appeal
pursuant to Rule 209 of the South Carolina Rules of Appellate Procedure:

1. All items listed in Appellant's Designation of Matter;

Pleadings

2. Respondent Jim Young and d/b/a J. Young Broilers' Pre-Hearing Statement, dated September 4, 2024;
3. Respondent Heath Coggins Broilers' Pre-Hearing Statement, dated September 4, 2024;
4. Affidavit of Adam Gaines and Exhibits to Affidavit, dated October 22, 2024;
5. Permittees' Reply to Petitioner's Response in Opposition to Motion to Dismiss, dated November 6, 2024;
6. Permittees' Response to Petitioner's Motion for Reconsideration, dated January 9, 2025.

The undersigned counsel certify that this designation contains no matter which is irrelevant to this appeal.

s/ Michael S. Traynham

Michael S. Traynham, SC Bar No. 75117

W. Thomas Lavender, Jr., SC Bar No. 3143

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June 2, 2025

Columbia, South Carolina

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PROOF OF SERVICE

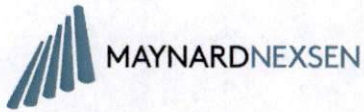
This is to certify that the foregoing Initial Brief and Designation of Matter on behalf of Respondents Heath Coggins Broilers and Jim Young and d/b/a J. Young Broilers has been served on counsel of record via electronic mail and U.S. mail as noted below, this 2nd day of June, 2025:

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s/ Michael S. Traynham
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Young Broilers, and Heath Coggins Broilers*



Michael S. Traynham
Of Counsel
Admitted in SC, NC

June 2, 2025

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SC Court of Appeals

VIA U.S. MAIL AND ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Initial Brief and Designation of Matter of Respondents Jim Young, d/b/a J. Young Broilers, and Heath Coggins Broilers; Appellate Case No. 2025-000294

Dear Madame Clerk:

Please find enclosed Respondents Jim Young, d/b/a J. Young Broilers, and Heath Coggins Broilers' Initial Brief, Designation of Matter, and Proof of Service in this matter for filing. By copy of this correspondence, counsel for all parties is being served electronically, and hard-copies are being placed in the mail today.

Should you require any additional information, please do not hesitate to reach out to me directly. Thank you for your assistance.

Kindest Regards,

A handwritten signature in blue ink that reads "Michael Traynham".

Michael S. Traynham

MST/dac

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